

## REMARKS

No claims have been added, canceled or amended. Claims 1-7, 9-18, 20, 21, 23-37, 39-41, 44-47, 49, 50, 52-54 are still pending in this application. The independent claims 1, 25, 37 and 52 remain rejected under 35 USC §103 as being unpatentable over *Carrott et al.* (*Carrott*) in view of *Tsuei et al.* (*Tsuei*).

Applicant appreciates the Examiner's detailed discussion in "Response to Arguments" (on page 2 of the Office Action) paraphrasing Applicant's arguments that were considered by the Examiner. In particular, the Examiner notes "Applicant argues that the cited references fail to disclose any enrollment data used to identify the party (response p. 11). What Applicant actually argued, however, is (some emphasis added, some emphasis in original):

In this present Reply E, Applicant would like to once again focus on a) – wherein **during an enrollment process**, a trusted party verifies the identity of the presenter using the enrollment data. The Examiner explicitly recognizes that Carrott, the primary reference, does not disclose a). ....We therefore look for any statement by the Examiner that Tsuei, the secondary reference, discloses a) – namely **an enrollment process** in which a trusted party verifies the identity of the presenter using the enrollment data.

The Examiner's "Response to Arguments," including citations to various portions of the Tsuei reference, make clear that the Examiner has apparently not considered the feature of Applicant's independent claims that a trusted party verifies the identity of a presenter "**during an enrollment process**."

Applicant recognizes that the Examiner's citations to Tsuei in the "Response to Arguments" section of the Office Action disclose a registration process. However, any description of authentication in Tsuei is "authentication" that takes place is of a user's identity during a transaction, after the enrollment process. The description of authentication in Tsuei is not a disclosure of verifying the identity of a user **during an enrollment process**.

For example, paragraph [0201] of Tsuei, which the Examiner cites in the "Response to Arguments" section of the Office Action, states in part that "the PMAC obtains customer name, billing information, mail delivery address, and possibly other information." There is also a statement in paragraph [0201] that "Once these data are collected and processed, the PMAC assigns a unique Private Mail Code to a customer." However, there is nothing to indicate that the processing referred to in this statement includes verifying the identity of the customer.

The Examiner also cites to paragraph [0202] of Tsuei in the Response to Arguments section of the Office Action. Paragraph [0202] discusses modifying subscription data. However, such modification is not during an enrollment process. Therefore, any “authentication process” in conjunction with such subscription data modification cannot be construed to be directed to verifying the identity of a presenter **during an enrollment process**. Furthermore, as has been discussed in previous responses, even if the presenter of the information was an imposter, as a result of the Tsuei enrollment/registration process, the imposter would be able to carry out transactions with respect to such information. In accordance with the subject matter recited in the independent claims, on the other hand, such information never would have made it into a central database since it would have been determined that the presenter of the information was an imposter during the process of attempting to verify the identity of the presenter.

Turning now to the body of the obviousness rejection, using Carrott and Tsuei, the Examiner notes (on page 5 of the Office Action):

According to Tsuei, once a subscriber enrolls and registers providing profile and enrollment data, a unique identifier is associated with that customer, upon matching such data and verification of the identity and credentials of the customer, notification is provided for the benefit of the requesting party over the Internet.....Therefore, it would have been obvious for one of ordinary skill in the art of the invention to modify Carrott’s purchase transaction system to provide an anonymous transaction verification mechanism to provide security to the subscriber while at the same time providing further verification confirmation for the requester.

Further discussion of Tsuei by the Examiner (on page 6 of the Office Action) discusses assigning a password for use to authenticate the cardholder of an alias account.

From the assertions by the Examiner regarding Tsuei in the body of the obviousness rejection using Carrott and Tsuei, it is clear that the Examiner considers Tsuei for an alleged disclosure of authenticating a user during a transaction, and that the Examiner does not consider Tsuei at all to disclose verifying the identity of a presenter **during an enrollment process**, as required by claim 1.

In fact, as Applicant has discussed in past responses, and as Applicant has attempted to highlight above, nowhere does Tsuei disclose or suggest such a feature of verifying the identity of a presenter **during an enrollment process**. This discussion is applicable to all of the presently-pending claims.

Consideration of this application and issuance of a Notice of Allowance at an early date are respectfully requested.

Respectfully submitted,  
BEYER WEAVER LLP

/ASH/  
Alan S. Hodes  
Reg. No. 38,185

P.O. Box 70250  
Oakland, CA 94612-0250  
(408) 255-8001